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January 17, 2022

**VIA ECF**

Honorable Joan M. Azrack  
United States District Judge  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

Re: *Ajay Bahl v. New York College of Osteopathic Medicine of New York  
Institute of Technology, et al.*, 14-CV-04020 (JMA)(ARL)

Dear Judge Azrack:

This firm represents Defendant New York Institute of Technology ("NYIT"), improperly named herein as New York College of Osteopathic Medicine of New York Institute of Technology, in the above-referenced action. We write to respectfully request a one-week adjournment of NYIT's January 28, 2022 deadline to serve its motion for summary judgment. We require additional time to prepare the motion in light of the extensive fact discovery in this case and to address Plaintiff's fourteen separate causes of action against NYIT.

NYIT proposes the following amended briefing schedule:

- NYIT's deadline to serve its summary judgment motion, extended to Friday, February 4, 2022;
- Plaintiff's deadline to oppose summary judgment, extended to Friday, April 1, 2022; and
- NYIT's deadline to serve its reply brief, extended to Friday, April 22, 2022.

We conferred with Plaintiff about NYIT's second request for an adjournment of its deadline to move for summary judgment. Plaintiff informed us that he retained new counsel, Gregory Tsonis, Esq.. Mr. Tsonis advised that Plaintiff consents to NYIT's adjournment request.

**CLIFTON BUDD & DEMARIA, LLP**

Honorable Joan M. Azrack

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Thank you for Your Honor's consideration of our request.

Respectfully Submitted,

CLIFTON BUDD & DEMARIA, LLP  
*Attorneys for Defendant NYIT*

*Stefanie Toren*

By:

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Douglas P. Catalano  
Stefanie R. Toren  
Stephen P. Pischl

cc: Mr. Gregory Tsonsis (via e-mail)